

REMARKS

Introduction

Claim 22 has been added, and therefore claims 1-22 are now pending in the application. In view of the following discussion, Applicants respectfully request that the Examiner reconsider the patentability of the claimed subject matter.

35 U.S.C. § 103 Rejections

Claims 1-6, 8-10, 13-15, and 17-19 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,563,517 to Bhagwat et al. ('*Bhagwat*') in view of U.S. Patent No. 7,098,914 to Katayama ('*Katayama*'); claims 11, and 20 have been rejected as being unpatentable over *Bhagwat* in view of *Katayama* and further in view of U.S. Patent Application Publication No. 2001/0032254 to Hawkins ('*Hawkins*'); and claims 7, 12, 16, and 21 have been rejected as being unpatentable over *Bhagwat* in view of *Katayama* and further in view of U.S. Patent No. 6,704,024 to Robotham et al. ('*Robotham*').

Claims 1-6, 8-10, 13-15, and 17-19 (based on *Bhagwat* and *Katayama*)

Among the features of independent claim 1, is the feature:

when said web page document includes more than one textual references to images that are directly adjoining, rendering each of the images represented by said textual references that are directly adjoining so as to generate a composite image, said textual references comprising conceptual linking in a common formatted object to signify directly adjoining images

In the Office Action, the Examiner acknowledges that *Bhagwat* does not teach or suggest this feature, but asserts that the *Katayama* reference cures the deficiency of the *Bhagwat* reference in that "*Katayama et al* teach text references such as placement information for indicating directly adjoining images when combining images for image synthesis". Applicant respectfully disagrees with this assertion.

Katayama purportedly discloses a panoramic image synthesis method in which a 'placement information setting unit' sets the placement relationship among input images. *Katayama*, col. 4, lines 63-65. The *Katayama* reference further explains that "[t]he placement can be done by moving the images on the screen 200 using a device, such as a mouse 120. Also,

it is possible to input a code for indicating the position of each image for performing the placement.” *Katayama*, col. 5, lines 19-23.

It is submitted that the Examiner has not explained how this ‘placement information’ obtained by moving images on a screen or inputting a code has anything to do with rendering each of the images represented by textual references that are directly adjoining so as to generate a composite image, let alone textual references comprising conceptual linking in a common formatted object. In other words, while the claimed invention recites rendering a composite image from taken from textual references that are adjoining, *Katayama* does not concern, mention or even suggest adjoining textual references (e.g., within an XML document), but only adjoining images. There is no discussion or suggestion at all of web documents or textual references from which images may be obtained.

For at least this reason, it is submitted that independent claim 1 and its dependent claims 2-6 and 8 are patentable over the *Bhagwat* and *Katayama* references. As independent claims 9 and 18 recite subject matter analogous to that of claim 1, it is submitted that these claims and their respective dependent claims 10, 13, 15 and 17 (dependent on claim 9) and 19 (dependent on claim 18).

Claims 11, and 20 (based on *Bhagwat*, *Katayama* and *Hawkins*):

Claim 11 depends from independent claim 9, and claim 20 depends from independent claim 18. The *Hawkins* reference does not cure the deficiencies of the *Bhagwat* and *Katayama* references discussed above (with respect to claim 1) in that it also does not teach or suggest the feature of rendering each of the images represented by said textual references that are directly adjoining so as to generate a composite image when said web page document includes more than one textual references to images that are directly adjoining. It is accordingly submitted that claims 11 and 20 are patentable over the *Bhagwat*, *Katayama*, and *Hawkins* references.

Claims 7, 12, 16, and 21 (based on *Bhagwat*, *Katayama* and *Robotham*)

Claims 7, 12, 16 and 21 are dependent claims. As the secondary *Robotham* reference also does not cure the deficiencies of the primary *Bhagwat* and *Katayama* references discussed above, it is submitted that claims 7, 12, 16 and 21 are likewise patentable over the *Bhagwat*, *Katayama* and *Robotham* references.

In view of the above, withdrawal of the rejections of pending claims 1-21 under 35 U.S.C. §103(a) is respectfully requested.

New Claim

New independent claim 22 has been added. New claim recites similar features as independent claim 1, however, the feature "said textual references comprising conceptual linking in a common formatted object to signify directly adjoined images," has been removed. This feature was added by amendment to overcome a rejection based in part on the *Fitzsimmons* reference (U.S. Published App. No. 2003/0034991) in the previous Office Action of May 3, 2007. Upon further review, it appears that the *Fitzsimmons* reference does not teach or suggest the feature of rendering each of the images represented by said textual references that are directly adjoining so as to generate a composite image when said web page document includes more than one textual references to images that are directly adjoining as was previously alleged. It is therefore submitted that new claim 22 is patentable.

Conclusion

All of the stated grounds of rejection have been properly addressed. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding rejections, and that they be withdrawn. The Examiner is invited to telephone the undersigned representative if an interview might expedite allowance of this application.

Respectfully submitted,

BERRY & ASSOCIATES P.C.

Dated: April 16, 2008

By: /Howard Grossman/
Howard Grossman
Registration No. 48,673
Phone: 212-871-6266

Correspondence Address

Cust. No. 49637

Berry & Associates, P.C.
9255 Sunset Boulevard, Suite 810
Los Angeles, CA 90069
Phone: (310) 247-2860
Fax: (310) 247-2864